

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CLAUDE REESE,

Plaintiff,

-against-

**PROPOSED JOINT  
STIPULATION OF FACTS**

ROBERT WILLIAMSON,  
STEVEN DRAPALA,  
RICHARD BODNAR,  
JUSTIN FRIEDLANDER,  
CLIFFORD DONOVAN,  
DANNY LAWRENCE,  
JOSEPH BURNS,  
ROBERT GARCIA,  
MICHAEL PADGETT,  
GLENROY RILEY and  
ANDREW MILYKO,

22 Civ. 10494 (PMH)

Defendants.

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The parties to the above-captioned action and their counsel hereby stipulate and agree to the following facts:

1. On May 1, 2020, Plaintiff was incarcerated at Otisville Correctional Facility.
2. On May 1, 2020, Defendants Robert Williamson, Steven Drapala, Andrew Milyko, Justin Friedlander, Clifford Donovan, Danny Lawrence, Joseph Burns, Robert Garcia, and Michael Padgett were all employed by the New York State Department of Corrections and Community Supervision (DOCCS) as officers at Otisville Correctional Facility.
3. On May 1, 2020, Defendants Glenroy Riley and Richard Bodnar were employed by DOCCS as correction sergeants.
4. On May 1, 2020, Plaintiff was involved in a use-of-force incident at Otisville Correctional Facility.

5. On May 1, 2020, two misbehavior reports were issued to Plaintiff.

6. Plaintiff never made any grievances or complaints about the conditions of his confinement, formal or informal, directly to Defendants Williamson or Friedlander.

7. Defendant Robert Williamson began at Otisville Correctional Facility on 9/30/1993, transferred to Eastern Correctional Facility on 4/14/2014, and then transferred back to Otisville on 2/4/2019.

Dated: New York, New York  
July 22, 2024

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**SO ORDERED:**

Philip M. Halpern, U.S.D.J.